EXHIBIT C

IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

In re:

Chapter 11

SEARS HOLDING CORPORATION, et

Case No. 18-23538 (RDD)

al.,

(Jointly Administered)

Debtors.

HEARING DATE: November 18,

2020 at 10 am

DECLARATION OF AUDREY RAPHAEL, ESQ.

- 1. My name is Audrey Raphael, and I am counsel of record for Armande Mock, individually and as personal representative of the Estate of Roy Mock, in a wrongful death and survival action filed in the State Court of Chatham County relating to Mr. Mock's death from malignant pleural mesothelioma.
- 2. This Declaration is given in support of Mock's Motion to Deem Proof of Claim Timely Filed.
- 3. The following statements are within the best of my personal knowledge and made under penalty of perjury.
- 4. I am a partner at the law firm Levy Konigsberg, LLP. My firm was counsel for the Mocks during the time Debtors filed their petition and remains so today.

5. To the best of my knowledge, no notice of the bar date was provided to anyone at my firm.

This 28 day of October, 2020,

DocuSigned by:

Audrey Raphael